UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FRANK MICHOLLE, Individually and on
Behalf of All Others Similarly Situated,

                      Plaintiff,

    vs.

OPHTHOTECH CORPORATION, DAVID R.
GUYER and SAMIR PATEL,

                  Defendants.

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:   Civil Action No. 1:17-cv-00210-VSB
:   **(Consolidated)**
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:   <u>CLASS ACTION</u>
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DECLARATION OF ERIN W. BOARDMAN IN SUPPORT OF
LEAD PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

I, Erin W. Boardman, declare under penalty of perjury as follows:

1.   I am a partner at the law firm Robbins Geller Rudman & Dowd LLP, counsel to Lead

Plaintiff Sheet Metal Workers' Pension Plan of Southern California, Arizona, and Nevada ("Lead

Plaintiff") in the above-captioned action, and am admitted to practice before this Court.   I

respectfully submit this Declaration in Support of Lead Plaintiff's Motion for Class Certification.

2.   Attached hereto as Exhibit A is a true and correct copy of the Report on Market

Efficiency by Professor Steven P. Feinstein, Ph.D., CFA, dated June 12, 2020.

3.   Attached hereto as Exhibit B is a true and correct copy of the Declaration of Vernon

Shaffer, Executive Director of Sheet Metal Workers' Pension Plan of Southern California, Arizona,

and Nevada, in Support of Lead Plaintiff's Motion for Class Certification, dated June 8, 2020.

4.   Attached hereto as Exhibit C is a true and correct copy of the Firm Resumé of

Robbins Geller Rudman & Dowd LLP.

I declare under the penalties of perjury that the foregoing is true and accurate. Dated this 12th day of June 2020 in Melville, New York.

DATED: June 12, 2020

/s/ Erin W. Boardman

ERIN W. BOARDMAN

CERTIFICATE OF SERVICE

I, Erin W. Boardman, hereby certify that on June 12, 2020, I authorized a true and correct copy of the foregoing Declaration of Erin W. Boardman in Support of Plaintiff's Motion for Class Certification to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

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/s/ Erin W. Boardman

ERIN W. BOARDMAN

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